

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**ADELY VANESSA DE LA CRUZ-  
ALVAREZ,**

**Defendant.**

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**CRIMINAL NO. EP-25-M-02401-LE**

**GOVERNMENT’S NOTICE OF POTENTIAL WITNESSES**

1. Raymundo Torres, Border Patrol Agent
2. Edgar Contreras, Border Patrol Agent
3. Carlos De La O, Border Patrol Agent
4. Maria Parga Davis, Border Patrol Agent
5. Demetria Walker, International Boundary and Water Commission

DATED this 2nd day of June, 2025.

Respectfully Submitted,

JUSTIN R. SIMMONS  
UNITED STATES ATTORNEY

By: /s/Phillip Countryman  
Phillip Countryman  
Texas Bar 24094380  
Assistant U.S. Attorney  
700 E. San Antonio, Suite 200  
El Paso, Texas 79901  
(915) 534-6884

**CERTIFICATE OF SERVICE**

I hereby certify that on June 2, 2025, a true and correct copy of the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System. A true copy of this sealed document will be provided to Defendant's Attorneys.

/s/Phillip Countryman

Phillip Countryman

Assistant U.S. Attorney